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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JENAIL H. NEWTON,	)
	) Case No. 2:18-cv-00971-GMN-GWF
Plaintiff,	)
	)
v.	) **JOINT STIPULATION AND [~~PROPOSED~~]**
	) **ORDER FOR EXTENSION OF TIME TO**
NANCY A. BERRYHILL,	) **RESPOND TO PLAINTIFF'S MOTION FOR**
Acting Commissioner of Social Security,	) **REVERSAL/REMAND.**
	)
Defendant.	) **(Second Request)**
.	)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that

the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended

from March 1, 2019 to **April 1, 2019**. This is Defendant's second request for extension. Good cause

exists to grant Defendant's request for extension. Counsel for Defendant was recently out of the office

on bereavement leave for funeral and prayer services following the death of her aunt. Counsel for

Defendant also has over 80+ active matters that require two or more dispositive motions per week

until mid-March. For example, Counsel has over 22 dispositive motions due in March. Due to

unexpected leave and heavy workload, Counsel for Defendant respectfully requests additional time to

respond to the issues raised in Plaintiff's Motion. Defendant apologizes for the belated request for extension, but had personal family emergency and sought and filed an extension of time as soon as reasonably practicable. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: March 1, 2019

/s/ _Joshua Harris_
(*as authorized by email on February 28, 2019)
JOSHUA HARRIS
Attorney for Plaintiff

Dated: March 1, 2019

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

By   /s/ _Tina L. Naicker_
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

DATED:__March 4, 2019_____   _____
THE HONORABLE GEORGE W. FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE